

Lee H. Rubin (State Bar #141331)
MAYER BROWN LLP
Two Palo Alto Square
Suite 300
Palo Alto, CA 94306-2112
(650) 331-2000
lrubin@mayerbrown.com

Robert E. Bloch (*pro hac vice*)
Gary A. Winters (*pro hac vice*)
Aimée D. Latimer-Zayets (*pro hac vice*)
MAYER BROWN LLP
1999 K Street NW
Washington, DC 20006-1101
(202) 263-3000
rbloch@mayerbrown.com
gwinters@mayerbrown.com
alatimer-zayets@mayerbrown.com

Counsel for Defendant Cypress Semiconductor Corporation

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

**IN RE STATIC RANDOM ACCESS
MEMORY (SRAM) ANTITRUST
LITIGATION**

Master File 4:07-md-1819-CW

MDL No. 1819

This Document Relates To:
ALL INDIRECT PURCHASER ACTIONS

**STIPULATION REGARDING
CYPRESS'S REPLY IN SUPPORT OF
MOTIONS FOR SEPARATE TRIALS
AND TO EXPEDITE RULING ON THE
FTAIA'S IMPACT ON INDIRECT
PURCHASER CLAIMS; [PROPOSED]
ORDER**

1 WHEREAS, pursuant to the Court's Order dated January 3, 2011 (Docket No. 1234),
2 defendant Cypress Semiconductor Corporation's ("Cypress") Reply in Support of Motion for
3 Separate Trials and Reply in Support of Motion to Expedite Ruling on the FTAIA's Impact on
4 Indirect Purchaser Claims (the "Replies") are due by 9 a.m. on Monday, January 17, 2011;

5 WHEREAS, Monday, January 17, 2011, is a Court holiday;

6 WHEREAS, the Office of the Clerk issued a notice on January 13, 2011 that the ECF
7 system will be non-operational due to maintenance from the evening of Friday, January 14,
8 2011, through 6:30 a.m. on the morning of Tuesday, January 18, 2011;

9 WHEREAS, the Court has informed counsel for Cypress that the parties may stipulate
10 regarding filing of the Replies;

11 WHEREAS, the parties have met and conferred, and hereby agree to two alternative
12 procedures for filing Cypress' Replies, as set forth below;

13 WHEREAS, Cypress will serve the Replies on all parties via email by 9:00 a.m. on
14 Monday, January 11, 2011;

15 THEREFORE, it is stipulated and agreed by Indirect Plaintiffs and Cypress, by and
16 through their counsel of record as follows:

17 Cypress shall send a copy of the Replies to the Court via e-mail to an address to be
18 provided by the Court by 9 a.m. on Monday, January 17, or, alternatively, Cypress shall file the
19 Replies when the ECF system becomes available on the morning of Tuesday, January 18,
20 whichever the Court prefers;

21 IT IS SO STIPULATED.

22 Dated: January 14, 2011

MAYER BROWN LLP

/s/

Gary A. Winters
Counsel for Defendant Cypress
Semiconductor Corporation

Dated: January 14, 2011

ZELLE HOFMANN VOELBEL &
MASON LLP

/s/

Christopher T. Micheletti
*Lead Counsel for Indirect Purchaser
Plaintiffs*

*Pursuant to General Order No. 45, Section X(B), I hereby attest that the above signatories
concur in the filing of this document.*

/s/

Lee Rubin

[PROPOSED] ORDER

Pursuant to stipulation of the parties, the Court orders as follows:

[Cypress shall send a copy of the Replies to the Court via e-mail to the following address
_____ by 9 a.m. on Monday, January 17, 2011.]

[Cypress shall file the Replies when the ECF system becomes available on Tuesday,
January 18, 2011.]

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

Hon. Claudia Wilken
United States District Court Judge